

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

ALTERRA AMERICA INSURANCE CO.,

Index No. 652813/2012 **E**

Plaintiff,

v.

Hon. Jeffrey K. Oing

NATIONAL FOOTBALL LEAGUE, et al.,

STIPULATION

Defendants.

DISCOVER PROPERTY & CASUALTY
COMPANY, et al.,

Index No. 652933/2012 **E**

Plaintiffs,

v.

Hon. Jeffrey K. Oing

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned
counsel as follows:

WHEREAS, pursuant to the November 14, 2016 Case Management Order, the
parties are required to complete their respective document productions by no later than
June 2, 2017;

WHEREAS, pursuant to the Case Management Order, the parties then in this
litigation served their demands for discovery and inspection on February 1, 2017;

WHEREAS, on March 17, 2017, the relevant parties served their responses to
demands for discovery and inspection;

WHEREAS, since March 17, 2017, the parties have been working diligently and in good faith to collect, review, and produce documents, consistent with their responses to demands for discovery and inspection;

WHEREAS, notwithstanding the progress that they have made to date, given the volume of documents that the parties must collect, review, and produce, the parties will not be able to complete their respective document productions by June 2, 2017;

WHEREAS, the parties have met and conferred and agree that the deadline for the completion of their respective document productions should be extended, and that the other disclosure deadlines in the Case Management Order should be adjusted to accommodate the extension;

WHEREAS, the Case Management Order provides that the disclosure deadlines set forth therein may be adjourned via stipulation amongst the parties;

WHEREFORE, it is hereby stipulated and agreed by and between the undersigned counsel that:

1. the June 2, 2017 deadline for the completion of document production in Case Management Order ¶ 3(d) is extended to and including August 31, 2017;
2. the March 30, 2018 deadline for the completion of depositions of fact witnesses in Case Management Order ¶ 5(b) is extended to and including June 29, 2018;
3. the April 13, 2018 deadline for the service of any expert reports in Case Management Order ¶ 6(b) is extended to and including July 13, 2018;

4. the June 15, 2018 deadline for the service of any rebuttal expert reports in Case Management Order ¶ 6(c) is extended to and including September 14, 2018;
5. the August 17, 2018 deadline for the completion of depositions of any experts in Case Management Order ¶ 6(d) is extended to and including November 16, 2018.

This stipulation may be executed in counterparts, each of which shall be deemed an original but all of which constitute one and the same agreement. Facsimile signatures, and those executed with the permission of counsel, shall have the same force and effect as originals.

Counsel for Defendants TIG Insurance Company, United States Fire Insurance Company, and The North River Insurance Company signs below on behalf of itself and states that counsel for all other insurer parties join in this stipulation.

Dated: May 25, 2017

COVINGTON & BURLING LLP

By: _____

John E. Hall

The New York Times Building
620 Eighth Avenue
New York, NY 10018
(212) 841-1000

*Attorneys for Defendants National
Football League and NFL Properties LLC*

CARROLL, McNULTY & KULL LLC

By: _____

Christopher R. Carroll

570 Lexington Avenue
New York, NY 10022
(212) 252-0004

*Attorneys for Defendants TIG Ins. Co., U.S.
Fire Ins. Co., and The North River Ins. Co.*